

EXHIBIT 301

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No. 19-md-02913-WHO

**DECLARATION OF KAYA LEHR-
LOVE**

This Document Relates to:

*San Francisco Unified School District v.
JUUL Labs, Inc., et al.*, Case No. 3:19-cv-
08177-WHO

1 I, Kaya Lehr-Love, declare as follows:

2 1. I am twenty-two years old and currently reside in San Francisco, California. I have
3 personal knowledge of the facts stated below and could and would testify competently thereto if
4 called upon.

5 2. I attended Abraham Lincoln High School ("ALHS") in the San Francisco Unified
6 School District from the fall of 2014 through the spring of 2018. I graduated from ALHS in 2018.
7 During my time at ALHS, I was a Youth Outreach Worker ("YOW"), a position in which
8 students work with their school wellness center to provide health and wellness education and peer
9 support.

10 3. In March 2018, I was interviewed by ABC Channel 7 News in San Francisco in
11 the article entitled "SF Students say JUUL Vaporizer Easy to Use at School," about the growing
12 vaping epidemic at SFUSD. In that interview, I expressed my opinion that the JUUL device was
13 just a new way to hook young people on smoking. I thought this was a marketing tactic of big
14 tobacco. Attached as Exhibit 1 is a true and correct copy of the news story for which I was
15 interviewed.

16 4. As indicated during the March 2018 interview, in my time at ALHS, I witnessed
17 vaping use by students take off in SFUSD schools. In my upperclassman years, I saw students
18 vaping in school every day. In my experience, students predominantly used the JUUL device.
19 Though other devices eventually grew in popularity, most students I knew started out using
20 JUUL.

21 5. I observed students vaping in classrooms, bathrooms, stairwells, and in other
22 indoor and outdoor common spaces on ALHS's campus. Students often vaped on public
23 transportation on their way to and from school.

24 6. In my experience, teachers often had difficulty recognizing that the JUUL device
25 was a vaping device. Many teachers mistook them for flash drives. Sometimes teachers had to
26 stop class to deal with vaping-related issues. Other times, students would vape in class without
27 getting caught.
28

11. I did not use vaping devices during my time at ALHS, but nonetheless I saw student vaping substantially impact my high school, causing classroom disruption and new addictions in formerly anti-tobacco students.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this
8
__ day of September, 2022.


DocuSigned by:

332DC26BE42A4A2...
Kaya Lehr-Love

EXHIBIT 1

Everything you need to know about monkeypox infection, vaccines, more


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Health & Fitness

SF Students say JUUL vaporizer easy to use at school

By by Melanie Woodrow via 
Thursday, March 8, 2018



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SAN FRANCISCO (KGO) -- According to its website, San Francisco based company JUUL,

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The vaporizer looks like a USB drive. It's a design that some Lincoln High School students in San Francisco say makes it easy to use right on campus, even though the campus is both smoke and vape free.

RELATED: [Controversial study links e-cigarettes with heart attacks](#)

"They go to the bathroom and do it or they try to just bend over under the table and take a little puff," said Ronnie Vidau.

San Francisco Unified School District is working to educate students.

"We want our young people to know that electronic vapor products are not safe," said Erica Lingrell who is a Program Administrator that supports health education across the district.

Students we spoke with say they don't use JUUL but have some ideas about why other students do.

"Teachers can't notice you all the time, it's easier to do," said Desean Crawford.

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In an email to ABC7 News, a spokesperson for JUUL writes, "We strongly condemn the use of our product by minors, and it is in fact illegal to sell our product to minors. No minor should be in possession of a JUUL product."

Youth Outreach Workers who are also students like Kaya Lehr-Love want to inform their peers.

"This is just one of their ways to get you into smoking it's just a marketing thing," said Lehr-Love.

JUUL says it's working to reduce the number of minors who use tobacco products including vapor products with initiatives that include limiting website sales to ages 21 and over, a secret shopper program to monitor age verification of retailers and working with

According to SFUSD, an anonymous survey given to students on health risk behaviors shows that the use of electronic vapor products has gone down. School officials believe that data suggests the youth outreach program has been effective.

[Click here](#) for more stories, photos, and video on vaping.

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